

Mr. Scott Irons
Citation Bohn Aluminum Corp.
P.O. Box 80
Butler, Indiana 46271

Re: 033-14732
First Significant Revision to
FESOP 033-7938-00016

Dear Mr. Irons:

Citation Bohn Aluminum was issued a FESOP on January 26, 1999 to operate the secondary aluminum foundry and die casting plant located at 6378 U.S. Highway 6 West, Butler, Indiana, 46721. Pursuant to the provisions of 326 IAC 2-8-11.1(g), a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes that combine the separate PM/PM10 emission limits for the metal melting and fluxing stages of the metal melt cycle. Metal melting in a furnace occurs as a single process, inclusive of the metal melting and refining (i.e., fluxing) stages. Combining the emission limits does not increase the total PM/PM10 emission limit for metal melting, previously expressed as two component values, and only one emission factor (and one set of emission factor units) is relied upon for compliance testing purposes. This FESOP revision does not change the existing limit on the source-wide potential to emit of PM/PM10 or any regulated pollutant. These pollutant emissions remain limited to less than 100 tons per year.

This approval also includes a change originally proposed by OAQ as First Reopening No. 033-13023. The First Reopening was public noticed between September 21, 2000 and October 20, 2000, without final approval issuance. The changes proposed in that approval have been incorporated into this revision.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. A copy of the revised permit is attached.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Michael Hirtler, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555, extension 3229, or in Indiana at 1-800-451-6027.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

MH / EVP

c: File - DeKalb County
U.S. EPA, Region V
DeKalb County Health Department
IDEM Northern Regional Office
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Citation Bohn Aluminum Corporation
6378 U.S. Highway 6 West
Butler, Indiana 46721**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F033-7938-00016	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 26, 1999 Expiration Date: January 26, 2004
First Administrative Amendment: 033-14004-00016	Issuance Date: May 14, 2001

First Significant Permit Revision: 033-14732-00016	Pages Affected: Cover Page, 9, 25, 26, 27, 29
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

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Citation Bohn Aluminum Corp.
Butler, Indiana
Permit Reviewer: MH/EVP

First Significant Permit Revision 033-14732
Revised by: MH / EVP

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary secondary aluminum foundry and die casting operation plant.

Responsible Official:	Leonard J. Roselle
Source Address:	6378 U.S. Highway 6 West, Butler, Indiana 46721
Mailing Address:	P.O. Box 80, Butler, Indiana 46721
SIC Code:	3365,3363,3341
County Location:	DeKalb
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD
	Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) reverberatory melt furnace identified as A1 with a maximum melt capacity of 0.6 tons of aluminum per hour, equipped with two (2) natural gas fired burners rated at 2.96 million (MM) British thermal units (Btu) per hour total, exhausting through one (1) stack identified as E-1.
- (b) One (1) reverberatory melt furnace identified as A2 with a maximum melt capacity of 0.8 tons of aluminum per hour, equipped with two (2) natural gas fired burners rated at 6.7 MMBtu per hour total, exhausting through one (1) stack identified as E-2.
- (c) One (1) reverberatory melt furnace identified as A3 with a maximum melt capacity of 1.25 tons of aluminum per hour, equipped with two (2) natural gas fired burners rated at 7.52 MMBtu per hour total, exhausting through one (1) stack identified as E-3.
- (d) One (1) reverberatory melt furnace identified as A4 with a maximum melt capacity of 1.25 tons of aluminum per hour, equipped with three (3) natural gas fired burners rated at 10.05 MMBtu per hour total, exhausting through one (1) stack identified as E-4.
- (e) One (1) reverberatory melt furnace identified as A5 with a maximum melt capacity of 1.25 tons of aluminum per hour, equipped with two (2) natural gas fired burners rated at 6.7 MMBtu per hour total, exhausting through one (1) stack identified as E-5.
- (f) One (1) reverberatory melt furnace identified as A6 with a maximum melt capacity of 1.25 tons of aluminum per hour, equipped with three (3) natural gas fired burners rated at 10.05 MMBtu per hour total, exhausting through one (1) stack identified as E-6.

- (g) One (1) reverberatory melt furnace identified as A7 with a maximum melt capacity of 1.0 ton of aluminum per hour, equipped with two (2) natural gas fired burners rated at 5.2 MMBtu per hour total, exhausting through one (1) stack identified as E-7.
- (h) One (1) reverberatory melt furnace identified as A8 with a maximum melt capacity of 0.25 tons of aluminum per hour, equipped with one (1) natural gas fired burner rated at 2.5 MMBtu per hour, exhausting through one (1) stack identified as E-8.
- (i) One (1) reverberatory melt furnace identified as A9 with a maximum melt capacity of 2.5 tons of aluminum per hour, equipped with four (4) natural gas fired burners rated at 10.6 MMBtu per hour total, exhausting through one (1) stack identified as E-9.
- (j) One (1) reverberatory melt furnace identified as A10 with a maximum melt capacity of 2.5 tons of aluminum per hour, equipped with six (6) natural gas fired burners rated at 9.0 MMBtu per hour total, exhausting through one (1) stack identified as E-10.
- (k) One (1) reverberatory melt furnace identified as A11 with a maximum melt capacity of 0.9 tons of aluminum per hour, equipped with six (6) natural gas fired burners rated at 15.9 MMBtu per hour total, exhausting through one (1) stack identified as E-11.
- (l) One (1) metal fluxing process with a maximum throughput of 65 pounds of powdered flux per hour, exhausting through eleven (11) stacks identified as E-1 through E-11.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, as follows:
 - (1) Thirty (30) natural gas-fired crucible holding furnaces, individually identified as HF1 through HF24 and HF28 through HF33, with a total combined maximum heat input rating of 21.9 MMBtu per hour;
 - (2) Four (4) natural gas-fired reverberatory holding furnaces, individually identified as S1, S2, S3, and S4, each with a maximum heat input rating of 5.8 MMBtu per hour; and
 - (3) Two (2) natural gas-fired heat treat furnaces, individually identified as HT1 and HT2, each with a maximum heat input rating of 0.3 MMBTU per hour.
- (b) Combustion source flame safety purging pump.
- (c) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (e) Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under a NESHAP.
- (f) Quenching operations used with heat treating processes.

- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (h) Heat exchanger cleaning and repair.
- (i) Process vessel degassing and cleaning to prepare for internal repairs.
- (j) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection trim material recovery device such as a bag filter or cyclone, including two (2) sawing and trimming operations individually identified as C-1 and C-2, with a combined maximum processing capacity of 2.0 tons aluminum per hour, with each operation utilizing one (1) cyclone for particulate matter control and one (1) exhaust stack respectively identified as E12 and E13.
- (k) Paved and unpaved roads and parking lots with public access.
- (l) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (m) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (n) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius).
- (o) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (p) Aluminum pouring and casting operations rated at 13.55 tons of melted aluminum per hour.
- (q) Ten (10) electric crucible holding furnaces, individually identified as HF34 through HF43.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

-
- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
 - (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

-
- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

Such confidentiality claim shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAQ).

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.
- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or

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- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation

Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.20 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.21 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;

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- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, *and* IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.24 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAQ shall reserve the right to issue a new permit.

B.25 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326

IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notify:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed, according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5][326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 Monitoring Data Availability [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner (or local agency) makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Descriptions [326 IAC 2-8-4(10)]:

- (a) One (1) reverberatory melt furnace identified as A1 with a maximum melt capacity of 0.6 tons of aluminum per hour, equipped with two (2) natural gas fired burners rated at 2.96 million (MM) British thermal units (Btu) per hour total, exhausting through one (1) stack identified as E-1.
- (b) One (1) reverberatory melt furnace identified as A2 with a maximum melt capacity of 0.8 tons of aluminum per hour, equipped with two (2) natural gas fired burners rated at 6.7 MMBtu per hour total, exhausting through one (1) stack identified as E-2.
- (c) One (1) reverberatory melt furnace identified as A3 with a maximum melt capacity of 1.25 tons of aluminum per hour, equipped with two (2) natural gas fired burners rated at 7.52 MMBtu per hour total, exhausting through one (1) stack identified as E-3.
- (d) One (1) reverberatory melt furnace identified as A4 with a maximum melt capacity of 1.25 tons of aluminum per hour, equipped with three (3) natural gas fired burners rated at 10.05 MMBtu per hour total, exhausting through one (1) stack identified as E-4.
- (e) One (1) reverberatory melt furnace identified as A5 with a maximum melt capacity of 1.25 tons of aluminum per hour, equipped with two (2) natural gas fired burners rated at 6.7 MMBtu per hour total, exhausting through one (1) stack identified as E-5.
- (f) One (1) reverberatory melt furnace identified as A6 with a maximum melt capacity of 1.25 tons of aluminum per hour, equipped with three (3) natural gas fired burners rated at 10.05 MMBtu per hour total, exhausting through one (1) stack identified as E-6.
- (g) One (1) reverberatory melt furnace identified as A7 with a maximum melt capacity of 1.0 ton of aluminum per hour, equipped with two (2) natural gas fired burners rated at 5.2 MMBtu per hour total, exhausting through one (1) stack identified as E-7.
- (h) One (1) reverberatory melt furnace identified as A8 with a maximum melt capacity of 0.25 tons of aluminum per hour, equipped with one (1) natural gas fired burner rated at 2.5 MMBtu per hour, exhausting through one (1) stack identified as E-8.
- (i) One (1) reverberatory melt furnace identified as A9 with a maximum melt capacity of 2.5 tons of aluminum per hour, equipped with four (4) natural gas fired burners rated at 10.6 MMBtu per hour total, exhausting through one (1) stack identified as E-9.
- (j) One (1) reverberatory melt furnace identified as A10 with a maximum melt capacity of 2.5 tons of aluminum per hour, equipped with six (6) natural gas fired burners rated at 9.0 MMBtu per hour total, exhausting through one (1) stack identified as E-10.
- (k) One (1) reverberatory melt furnace identified as A11 with a maximum melt capacity of 0.9 tons of aluminum per hour, equipped with six (6) natural gas fired burners rated at 15.9 MMBtu per hour total, exhausting through one (1) stack identified as E-11.
- (l) One (1) metal fluxing process with a maximum throughput of 65 pounds of powdered flux per hour, exhausting through eleven (11) stacks identified as E-1 through E-11.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-8]

The source shall limit production in reverberatory melt furnaces A1 through A11 as follows:

- (a) The total amount of aluminum produced is limited to 59,206 tons per twelve (12) consecutive month period. The total amount of aluminum produced each month shall not exceed the difference between the annual limit minus the sum of actual metal produced during the previous eleven (11) months.
- (b) PM emissions from each furnace shall not exceed 3.0 pounds of PM emitted per ton of metal produced which includes the aluminum refining (i.e., flux addition) stage at the end of the melt cycle.
- (c) PM10 emissions from each furnace shall not exceed 2.6 pounds of PM10 emitted per ton of metal produced which includes the aluminum refining (i.e., flux addition) stage at the end of the melt cycle.
- (d) These usage limits are required to limit the potential to emit PM and PM10 from metal production to less than 88.8 and 77.0 tons per twelve (12) consecutive month period, respectively, and to limit the source-wide potential to emit both PM and PM10 to less than 100 tons per twelve (12) consecutive month period. Compliance with this condition makes 326 IAC 2-2 and 40 CFR 52.21 not applicable. Compliance with this condition will also satisfy 326 IAC 2-8-4 and, therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

The aluminum refining (i.e., flux addition) stage at the end of the melt cycle in furnaces A1 through A11 shall be limited as follows:

- (a) The total hexachloroethane input usage in the fluxing process shall not exceed 56,237 pounds per twelve (12) consecutive month period. The total amount of hexachloroethane used each month shall not exceed the difference between the annual limit minus the sum of actual hexachloroethane used during the previous eleven (11) months.
- (b) Hydrochloric acid (HCl) emissions from each furnace shall not exceed 0.3343 pounds of HCl emitted per pound of hexachloroethane used.
- (c) This usage limit is required to limit the potential to emit of a single HAP to less than 10 tons per twelve (12) consecutive month period. Compliance with (a) and (b) of this condition shall also limit the source-wide potential to emit combined HAPs to less than 25 tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) do not apply.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the facilities shall be limited as follows:
- (1) The facility identified as A1 shall not exceed 3.02 pounds per hour when operating at a process weight rate of 0.63 tons per hour.
 - (2) The facility identified as A2 shall not exceed 3.63 pounds per hour when operating at a process weight rate of 0.83 tons per hour.
 - (3) The facility identified as A3 shall not exceed 4.84 pounds per hour when operating at a process weight rate of 1.28 tons per hour.
 - (4) The facility identified as A4 shall not exceed 4.84 pounds per hour when operating at a process weight rate of 1.28 tons per hour.
 - (5) The facility identified as A5 shall not exceed 4.84 pounds per hour when operating at a process weight rate of 1.28 tons per hour.
 - (6) The facility identified as A6 shall not exceed 4.84 pounds per hour when operating at a process weight rate of 1.28 tons per hour.
 - (7) The facility identified as A7 shall not exceed 4.19 pounds per hour when operating at a process weight rate of 1.03 tons per hour.
 - (8) The facility identified as A8 shall not exceed 1.76 pounds per hour when operating at a process weight rate of 0.28 tons per hour.
 - (9) The facility identified as A9 shall not exceed 7.64 pounds per hour when operating at a process weight rate of 2.53 tons per hour.
 - (10) The facility identified as A10 shall not exceed 7.64 pounds per hour when operating at a process weight rate of 2.53 tons per hour.
 - (11) The facility identified as A11 shall not exceed 3.91 pounds per hour when operating at a process weight rate of 0.93 tons per hour.

- (b) The pounds per hour allowable PM emission rates were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1),(4)]

- (a) During the period within 24 to 30 months after issuance of this permit, the Permittee shall perform testing on reverberatory furnaces A2, one (1) of furnaces A3 through A6, and one (1) of furnaces A9 and A10 as follows:
 - (1) During metal melting and metal fluxing the Permittee shall perform PM and PM-10 testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner, to demonstrate compliance with Condition D.1.1(a). PM-10 includes filterable and condensible PM-10.
 - (2) During the end of a melt cycle that encompasses the entire metal fluxing process, the Permittee shall perform HAP testing for hydrochloric acid utilizing Methods 18, 26A (40 CFR 60, Appendix A), or other methods as approved by the Commissioner, to demonstrate compliance with Condition D.1.2(a).
- (b) Testing shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (c) In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the reverberatory melt furnaces' exhaust stacks (E-1 through E-11) shall be performed during normal daylight operations when metal melting and fluxing is occurring and when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) and (2) below.
 - (1) Calendar dates covered in the compliance determination period; and
 - (2) Actual total aluminum produced and the emitted PM and PM10 for each month of the compliance determination period.
- (b) To document compliance with Condition D.1.2 the Permittee shall maintain records in accordance with (1) and (2) below.
 - (1) Calendar dates covered in the compliance determination period; and
 - (2) Actual total hexachloroethane input usage and the emitted hydrochloric acid for each month of the compliance determination period.
- (c) To document compliance with Condition D.1.5 the Permittee shall maintain records of daily visible emission notations of the reverberatory melt furnace exhaust stacks.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the calendar quarter being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Descriptions [326 IAC 2-8-4(10)]: The following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection trim material recovery device such as a bag filter or cyclone, including two (2) sawing and trimming operations individually identified as C-1 and C-2, with a combined maximum processing capacity of 2.0 tons aluminum per hour, with each operation utilizing one (1) cyclone for particulate matter control and one (1) exhaust stack respectively identified as E12 and E13.
- (c) Aluminum pouring and casting operations rated at 13.55 tons of melted aluminum per hour.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the sawing and trimming operations identified as C-1 and C-2 shall not exceed 7.58 pounds per hour when operating at a process weight rate of 2.50 tons per hour. This is equivalent to 3.03 pounds of PM per ton of metal processed.
- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the pouring and casting operation shall not exceed 23.51 pounds per hour when operating at a process weight rate of 13.55 tons per hour. This is equivalent to 1.74 pounds of PM per ton of metal processed.
- (c) The pounds per hour allowable PM emission rates were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;

- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-8-5(a)(1),(4)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no applicable compliance monitoring conditions for these facilities.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

There are no specific record keeping or reporting requirements for these facilities.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Citation Bohn Aluminum Corp.
Source Address: 6378 U.S. Highway 6 West, Butler, IN 46721
Mailing Address: 6378 U.S. Highway 6 West, Butler, IN 46721
FESOP No.: F033-7938-00016

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information
in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Citation Bohn Aluminum Corp.
Source Address: 6378 U.S. Highway 6 West, Butler, IN 46721
Mailing Address: 6378 U.S. Highway 6 West, Butler, IN 46721
FESOP No.: F033-7938-00016

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9 1.** This is an emergency as defined in 326 IAC 2-7-1(12)
 CThe Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 CThe Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9 2.** This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
 CThe Permittee must submit notice in writing within ten **(10)** calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Citation Bohn Aluminum Corp.
Source Address: 6378 U.S. Highway 6 West, Butler, IN 46721
Mailing Address: 6378 U.S. Highway 6 West, Butler, IN 46721
FESOP No.: F033-7938-00016
Facility: Total aluminum produced in reverberatory melt furnaces A1 through A11
Parameter: PM and PM-10
Limit: The total amount of aluminum produced is limited to 59,206 tons per twelve (12) consecutive month period. The total amount of aluminum produced each month shall not exceed the difference between the annual limit minus the sum of actual metal produced during the previous eleven (11) months.

YEAR: _____

Month	Total Aluminum Produced This Month (Tons)	Total Aluminum Produced Last 12 Months (Tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Citation Bohn Aluminum Corp.
Source Address: 6378 U.S. Highway 6 West, Butler, IN 46721
Mailing Address: 6378 U.S. Highway 6 West, Butler, IN 46721
FESOP No.: F033-7938-00016
Facility: Total hexachloroethane input usage in the fluxing process
Parameter: Hexachloroethane
Limit: The total hexachloroethane input usage in the fluxing process is limited to 56,237 pounds per twelve (12) consecutive month period. The total amount of hexachloroethane used each month shall not exceed the difference between the annual limit minus the sum of actual hexachloroethane used during the previous eleven (11) months.

YEAR: _____

Month	Total Hexachloroethane Input Usage to Flux This Month (Tons)	Total Hexachloroethane Input Usage to Flux Last 12 Months (Tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Citation Bohn Aluminum Corp.
Source Address: 6378 U.S. Highway 6 West, Butler, IN 46721
Mailing Address: 6378 U.S. Highway 6 West, Butler, IN 46721
FESOP No.: F033-7938-00016

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.5)	Number of Deviations	Date of each Deviations

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Name:	Citation Bohn Aluminum Corporation
Source Location:	6378 U.S. Highway 6 West, Butler, Indiana 46721
County:	DeKalb
SIC Code:	3365,3363,3341
Operation Permit No.:	F033-7938-00016
Operation Permit Issuance Date:	January 26, 1999
Significant Permit Revision No.:	033-14732-00016
Permit Reviewer:	Michael Hirtler / EVP

On September 21, 2001, the Office of Air Quality (OAQ) had a notice published in the Auburn Evening Star, in Auburn, Indiana, stating that Citation Bohn Aluminum Corp. had applied for a Significant Permit Revision to their FESOP to combine the separate PM/PM10 emission limits for the metal melting and fluxing stages of the metal melt cycle. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The OAQ has changed the Significant Permit Revision to the FESOP such that references to the source as *Bohn Aluminum Corporation* are revised to *Citation Bohn Aluminum Corporation*. These changes are made without replication herein.

Additionally, while no change has occurred at this source beyond that described in the **History** section of the Technical Support Document (TSD) to this permit revision, the OAQ has decided to combine this approval with First Reopening No. 033-13023. The 30-day public comment period for the draft First Reopening ended on October 20, 2000 and, since that approval is yet unissued, OAQ has decided to consolidate the two approvals herein. The following states the purpose of the First Reopening as found in the public notice for that draft approval:

As part of U.S. EPA's 1997 Compliance Assurance Monitoring rule making (Federal Register Volume 62, page 54900-54947, Wednesday, October 22, 1997), the language in 40 CFR Part 70.6 (c)(5)(iii)(B) was changed from "continuous or intermittent compliance" to "based on continuous or intermittent data". The U.S. District Court of Appeals, Washington D.C. ruled against U.S. EPA's language, saying that the Clean Air Act wording of continuous or intermittent compliance had to be used (NRDC vs. EPA, #97-1727). Therefore, the following change is made to Condition B.12(c) (Annual Compliance Certification) of the permit to be consistent with state and federal law, with new language shown in bold and deleted language with a line through it:

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;

- (2) The compliance status;
- (3) Whether compliance was ~~based on~~ continuous or intermittent ~~data~~;
- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the ~~"responsible official" as defined by 326 IAC 2-7-1(34)~~ **"authorized individual" as defined by 326 IAC 2-1.1-1(1).**

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Bohn Aluminum Corporation
Source Location:	6378 U.S. Highway 6 West, Butler, Indiana 46721
County:	DeKalb
SIC Code:	3365,3363,3341
Operation Permit No.:	F033-7938-00016
Operation Permit Issuance Date:	January 26, 1999
Significant Permit Revision No.:	033-14732-00016
Permit Reviewer:	Michael Hirtler / EVP

The Office of Air Quality (OAQ) has reviewed a revision application from Bohn Aluminum Corporation relating to the operation of a secondary aluminum foundry and die casting source.

History

On January 26, 1999, Bohn Aluminum Corporation was issued FESOP No. 033-7938-00016. Included in the FESOP was a requirement for the source to perform compliance testing of particulate matter (i.e., PM and PM-10) and hazardous air pollutant (as hydrogen chloride, HCl) emissions during metal melting and fluxing. On March 6, 2001, the source submitted a letter to the OAQ requesting that the language in the testing condition of the FESOP be revised to provide for more meaningful compliance testing. The original language of the test condition (i.e., FESOP Condition D.1.4) was not consistent with the metal melting process, which is a batch process, and, as stated, would have required the source to perform unintended excessive PM/PM10 emissions testing. The requested language change to the condition was approved by OAQ on May 14, 2001 as First Administrative Amendment No. 033-14004. As a follow-up to this amendment, both the source's stack testing consultant and OAQ have agreed that the language of the revised testing condition and the related PM/PM10 emission limits at Condition D.1.1(a) and (b) remain awkward and ineffectual from a compliance testing stand-point. This permit revision provides changes to the PM/PM10 emission limits to allow for proper compliance testing for this type of process and consistency with the intent of the administrative amendment. There is no new equipment added to the source during this review, nor does the proposed change increase source emissions, affect source applicability with respect to 326 IAC 2-8, or trigger any new requirements.

Revisions Requested

The source has consulted with the OAQ and, upon consideration, the OAQ has agreed to the following requested revisions to the issued FESOP:

- (a) Combine the separate PM/PM10 emission limits specified at Condition D.1.1(a) and (b) for the respective metal melting and fluxing stages of the metal melt cycle. While the original FESOP application provided separate information on these two (2) stages of a metal melt cycle, metal melting in a furnace occurs as a single process, inclusive of the metal refining (i.e., fluxing) stage. Combining the emission limits does not increase the total PM/PM10 emission limit for metal melting, previously expressed as two component values, and only one emission factor (and one set of emission factor units) is relied upon for compliance testing purposes.
- (b) Revise the PM/PM10 compliance testing requirement of Condition D.1.4 such that the metal fluxing portion of the melt cycle is included as part of the compliance test run for the melt furnaces.

Existing Approvals

The source was issued a FESOP No. 033-7938-00016 on January 6, 1999. The source has since received the following:

- (a) First Administrative Amendment No.: 033-14004, issued on May 14, 2001.

The source has since been operating under these approvals.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the original FESOP application and information contained in the existing FESOP and administrative amendment.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

There will be no increase of Potential to Emit for any regulated air pollutant due to the proposed revision. However, the proposed revisions do not qualify as a revision pursuant to 326 IAC 2-8-10 (Administrative Permit Amendment) nor as a revision pursuant to 326 IAC 2-8-11.1(d) (Minor Permit Revisions) because of the change to clarify the existing limits. Therefore, pursuant to 326 IAC 2-8-11.1(g), a Significant Permit Revision review is required for the requested revisions.

Federal Rule and State Rule Applicability

There are no changes in federal and state rule applicability to the source due to the proposed significant permit revision.

Proposed Changes to the Federally Enforceable State Operating Permit

The following changes are made as the First Significant Permit Revision to FESOP No. 033-7938-00016. New language is shown in **bold** and deleted language is shown with a ~~line through it~~:

1. Condition D.1.1 (PSD Minor Limit) has been revised to reflect the fact that aluminum refining (i.e., fluxing) occurs as part of the metal melting cycle and is not a separate process. The PM and PM10 emission limits for metal fluxing, originally written at Condition D.1(b) as 4.4 tons per year, based on 144,424 pounds per year of flux and 0.0614 pounds of PM and PM10 emitted per pound of flux used, have been added to the limits presented in D.1.1(a); and D.1(b) has been removed. For metal production, this results in a single PM and PM10 emission factor of 3.0 pounds of PM emitted per ton of metal produced and 2.6 pounds of PM10 emitted per ton of metal produced, respectively; and unified emission limits on PM and PM10 of 88.8 tons and 77.0 tons per year, respectively, based on an aluminum production limit of 59,206 tons per year (i.e., original limit of 56,273 tons per year increased by the ratio of (88.8/84.4)). It is noted that the PM10 emission rate is increased to only 3.8 tons per year, rather than 4.4 tons per year, since the PM10 emission factor for metal production is lower than that for PM (i.e., 2.6 pounds of PM10 emitted per ton of metal produced, which is equivalent to 3.8 tons per year PM10 at a limit of 59,206 tons of aluminum produced). Condition D.1.1 has also been re-organized for greater clarity, and is revised as follows:

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-8]

The source shall limit production in reverberatory melt furnaces A1 through A11 ~~and at the metal fluxing process~~ as follows:

- (a) ~~Reverberatory melt furnaces A1 through A11:~~
 - (i) The total amount of aluminum produced is limited to ~~56,273~~ **59,206** tons per twelve (12) consecutive month period. ~~This production limit is required to limit potential to emit. The total amount of aluminum produced each month shall not exceed the difference between the annual limit minus the sum of actual metal produced during the previous eleven (11) months.~~
- (b) ~~(i)~~ PM ~~to 84.4 tons per twelve (12) consecutive month period, based on emissions from each furnace shall not exceed 3.0 pounds of PM emitted per ton of metal produced which includes the aluminum refining (i.e., flux addition) stage at the end of the melt cycle.~~

- (c) (ii) ~~PM10 to 73.2 tons per twelve (12) consecutive month period, based on emissions from each furnace shall not exceed 2.6 pounds of PM10 emitted per ton of metal produced which includes the aluminum refining (i.e., flux addition) stage at the end of the melt cycle.~~

- ~~(2) The total amount of aluminum produced each month shall not exceed the difference between the annual limit minus the sum of actual metal produced during the previous eleven (11) months.~~

- ~~(b) Metal fluxing process:~~

- ~~(1) The total flux used for aluminum refining is limited to 144,424 pounds per twelve (12) consecutive month period. This production limit is required to limit potential to emit PM and PM10 to 4.4 tons per twelve (12) consecutive month period each, based on 0.0614 pounds PM and PM10 emitted per pound of flux used.~~

(Note: As indicated at the beginning of this section, these metal fluxing PM and PM10 emission rate limits were simply added to the stated limits of paragraph (a) of this condition).

- ~~(2) The total amount of flux used each month shall not exceed the difference between the annual limit minus the sum of actual flux used during the previous eleven (11) months.~~

- (ed) These usage limits are required to limit the ~~source-wide~~ potential to emit PM and PM10 **from metal production to less than 88.8 and 77.0 tons per twelve (12) consecutive month period, respectively, and to limit the source-wide potential to emit both PM and PM10 each** to less than 100 tons per twelve (12) consecutive month period. Compliance with this condition makes 326 IAC 2-2 and 40 CFR 52.21 not applicable. Compliance with this condition will also satisfy 326 IAC 2-8-4 and, therefore, the Part 70 rules (326 IAC 2-7) do not apply.

2. Condition D.1.2 (Hazardous Air Pollutants) has been updated to provide consistent format and clarity as found in Condition D.1.1, as presented above:

(Note: The aluminum refining stage of the melt cycle involves the use of flux that contains hexachloroethane, which is itself a HAP. However, the thermal reaction that occurs during fluxing results in the hexachloroethane being chemically reacted such that hydrochloric acid is emitted, with virtually no component hexachloroethane being emitted. This was confirmed during a 1996 OAQ approved stack test of metal fluxing at the source, with hexachloroethane emissions determined to be less than the detection limit of the relevant equipment used for such compound. Even at the equipment's detection limit for hexachloroethane, the test report indicated the emission rate to be only 0.2% of the hydrochloric acid emission rate. Based on this, no limit nor test has been required for hexachloroethane itself, and, instead, hydrochloric acid is the limited pollutant. Similarly, the flux used by the source contains hexafluorosilicate which, in the thermal reaction, produces emissions of hydrofluoric acid. Again, from the 1996 OAQ approved stack test, the hydrofluoric emission factor (0.0143 pounds per pound of flux) results in a potential hydrofluoric acid emission rate of only 2.5 tons per year (see TSD to Appendix A of F033-7938-00016, issued January 26, 1999). Based on this, no limit nor test has been required for hydrofluoric acid related emissions. Further, when the limited usage of hexachloroethane, which results in less than 10 tons per year of hydrochloric acid emissions, is combined with the low potential emissions of hydrofluoric acid and hexachloroethane (as a non-detectable pollutant), the potential to emit total HAPs is well below 25 tons per year and, therefore, compliance with (a)(1) of the following revised condition results in compliance with 326 IAC 2-8.)

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

Hazardous air pollutants input to the metal fluxing process The aluminum refining (i.e., flux addition) stage at the end of the melt cycle in furnaces A1 through A11 shall be limited as follows:

- (a) **The total hexachloroethane input usage to in the fluxing process is limited to shall not exceed 56,237 pounds per twelve (12) consecutive month period. This usage limit is required to limit potential to emit a single HAP (as hydrochloric acid) to less than 10 tons per twelve (12) consecutive month period, based on 0.3343 pounds hydrochloric acid emitted per pound of hexachloroethane used. The total amount of hexachloroethane used each month shall not exceed the difference between the annual limit minus the sum of actual hexachloroethane used during the previous eleven (11) months.**
- (b) **The total amount of hexachloroethane used each month shall not exceed the difference between the annual limit minus the sum of actual hexachloroethane used during the previous eleven (11) months. Hydrochloric acid (HCl) emissions from each furnace shall not exceed 0.3343 pounds of HCl emitted per pound of hexachloroethane used.**
- (c) **The amount of the combination of HAPs used shall be limited to less than 25 tons per twelve (12) consecutive month period. Compliance with (a) and (b) of this condition shall also satisfy this requirement. This usage limit is required to limit the potential to emit of a single HAP to less than 10 tons per twelve (12) consecutive month period. Compliance with (a) and (b) of this condition shall also limit the source-wide potential to emit combined HAPs to less than 25 tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) do not apply.**

3. Condition D.1.3(a) (Particulate Matter) has been updated to include the process weight rate of the flux material (i.e., maximum of 65 pounds per hour) in the determination of the allowable PM emission rate, and to eliminate D.1.3(a)(12) for the fluxing process alone. As explained in the preceding paragraph, aluminum refining (i.e., fluxing) occurs as part of the metal melting cycle and is not a separate process. Additionally, the allowable particulate matter emission limitations, as determined pursuant to 326 IAC 6-3-2, are to be expressed in units of *pounds of particulate matter per hour*, based on the appropriate formula. As such, the limits expressed in units of *pounds of PM per ton of metal melted* have been removed since they are inconsistent with the rule. The condition is revised as follows:

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the facilities shall be limited as follows:
- (1) The facility identified as A1 shall not exceed ~~2.94~~ **3.02** pounds per hour when operating at a process weight rate of 0.63 tons per hour. ~~This is equivalent to 4.85 pounds of PM per ton of metal melted.~~
 - (2) The facility identified as A2 shall not exceed ~~3.53~~ **3.63** pounds per hour when operating at a process weight rate of 0.83 tons per hour. ~~This is equivalent to 4.41 pounds of PM per ton of metal melted.~~
 - (3) The facility identified as A3 shall not exceed ~~4.76~~ **4.84** pounds per hour when operating at a process weight rate of 1.25 **1.28** tons per hour. ~~This is equivalent to 3.81 pounds of PM per ton of metal melted.~~
 - (4) The facility identified as A4 shall not exceed ~~4.76~~ **4.84** pounds per hour when operating at a process weight rate of 1.25 **1.28** tons per hour. ~~This is equivalent to 3.81 pounds of PM per ton of metal melted.~~
 - (5) The facility identified as A5 shall not exceed ~~4.76~~ **4.84** pounds per hour when operating at a process weight rate of 1.25 **1.28** tons per hour. ~~This is equivalent to 3.81 pounds of PM per ton of metal melted.~~
 - (6) The facility identified as A6 shall not exceed ~~4.76~~ **4.84** pounds per hour when operating at a process weight rate of 1.25 **1.28** tons per hour. ~~This is equivalent to 3.81 pounds of PM per ton of metal melted.~~
 - (7) The facility identified as A7 shall not exceed ~~4.10~~ **4.19** pounds per hour when operating at a process weight rate of 1.00 **1.03** tons per hour. ~~This is equivalent to 4.10 pounds of PM per ton of metal melted.~~
 - (8) The facility identified as A8 shall not exceed ~~1.62~~ **1.76** pounds per hour when operating at a process weight rate of 0.25 **0.28** tons per hour. ~~This is equivalent to 6.48 pounds of PM per ton of metal melted.~~
 - (9) The facility identified as A9 shall not exceed ~~7.58~~ **7.64** pounds per hour when operating at a process weight rate of 2.50 **2.53** tons per hour. ~~This is equivalent to 3.03 pounds of PM per ton of metal melted.~~

- (10) The facility identified as A10 shall not exceed ~~7.58~~ **7.64** pounds per hour when operating at a process weight rate of ~~2.50~~ **2.53** tons per hour. ~~This is equivalent to 3.03 pounds of PM per ton of metal melted.~~
 - (11) The facility identified as A11 shall not exceed ~~3.82~~ **3.91** pounds per hour when operating at a process weight rate of ~~0.90~~ **0.93** tons per hour. ~~This is equivalent to 4.24 pounds of PM per ton of metal melted.~~
 - ~~(12) The metal fluxing process shall not exceed 23.54 pounds per hour when operating at a process weight rate of 13.58 tons per hour. This is equivalent to 1.73 pounds of PM per ton of metal plus flux processed.~~
4. Condition D.1.6 (a) and (b) (Record Keeping Requirements) have been revised to reflect the changes explained in (a) and (b) above. Also, based on the changes discussed herein, the separate quarterly flux usage reporting form has been removed from the permit without replication herein. The quarterly aluminum production reporting form remains, but has been revised without replication herein to indicate the revised aluminum production limit. The condition is revised as follows:

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) and (2) below.
 - (1) Calendar dates covered in the compliance determination period; and
 - (2) Actual total aluminum produced and ~~flux used~~ **the emitted PM and PM10 for each month of the** ~~since last compliance determination period and values calculated per limitation.~~
- (b) To document compliance with Condition D.1.2 the Permittee shall maintain records in accordance with (1) and (2) below.
 - (1) Calendar dates covered in the compliance determination period; and
 - (2) Actual total hexachloroethane input usage **and the emitted hydrochloric acid for each month of the** ~~since last compliance determination period and value calculated per limitation.~~

Testing Requirements

There is no change to Condition D.1.4 (Testing Requirements) for this revision. As discussed under the **History** section herein, First Administrative Amendment No. 033-14004, issued on May 14, 2001, approved new clarifying language for the Condition D.1.4. The purpose of this approval is to make the emission limits of the permit consistent and meaningful with respect to the requisite compliance testing.

Conclusion

The operation of this secondary aluminum foundry and die casting source shall be subject to the conditions of the attached proposed **Significant Permit Revision No. 033-14004-00016.**